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Attorneys for Defendant Nancy Summersgill

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Case No.: CR 3-07-70721 MEJ

Plaintiff,

13 v.

**STIPULATION AND [PROPOSED]  
ORDER FOR MODIFICATION TO A  
TERM AND CONDITION OF  
DEFENDANT NANCY SUMMERSGILL'S  
PRETRIAL RELEASE**

NANCY SUMMERSGILL,

## Defendants.

Defendant Nancy Summersgill was released by this Court on December 11, 2007, and ordered to appear in the Eastern District of Virginia for case no. 1:08CR0008GBL. On January 14, 2008, Ms. Summersgill in fact appeared in the Eastern District of Virginia and entered a guilty plea as to that matter. She is scheduled to return for sentencing on April 25, 2008.

Ms. Summersgill's conditions of release restrict her movement to the Northern District of California, the Eastern District of Virginia and the state of Hawaii. Defendant Summersgill requests that this condition be modified so that she may also travel to the District of Columbia with the approval of Pretrial Services.

Ms. Betty Kim, defendant Summersgill's Pretrial Services Officer, has indicated her consent to the Court's modification of this term of defendant Summersgill's pretrial release.

III

Similarly, the prosecutor in defendant Summersgill’s matter in the Eastern District of Virginia, Assistant United States Attorney Dennis M. Fitzpatrick consents to the Court’s modification of this term of defendant Summersgill’s pretrial release.

IT IS SO ORDERED.

Dated: January \_\_\_, 2008

MARIA ELENA JAMES  
UNITED STATES MAGISTRATE JUDGE

Approved as to form:

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/s/  
EDWIN K. PRATHER  
Clarence & Dyer LLP  
Attorneys for Defendant Nancy Summersgill

/s/  
DENNIS M. FITZPATRICK  
Assistant United States Attorney

## 1 Proof of Service

2 I, Abbie Chin, declare as follows:

3 I am over eighteen years of age and not a party to the within action; my business address  
4 is 899 Ellis Street, San Francisco, California 94109; I am employed in the County of San  
Francisco.

5 On January 24, 2008, I served a copy, with all exhibits, of the following documents:

6 • STIPULATION AND [PROPOSED] ORDER FOR MODIFICATION TO A TERM  
7 AND CONDITION OF DEFENDANT NANCY SUMMERSGILL'S PRETRIAL RELEASE8 X (BY FAX) By transmitting by facsimile machine to the number addressed as below;  
9 the facsimile machine I used complied with California Rules of Court, rule 2003 and no error was  
10 reported by the machine. Pursuant to California Rules of Court, rule 2006(d), I caused the  
11 machine to print a transmission record of the transmission.12 X (BY ELECTRONIC SERVICE) I caused an electronic delivery subject to 28 U.S.C  
13 ¶1746, Local Rules or General Orders of this Court regarding Electronic Case Filing. All  
14 pleadings and papers must be electronically served in accordance with those Rules or General  
Orders with email address(es) as noted below:

15 By Email

16 **Dennis Fitzpatrick**17 United States Attorney's Office  
2100 Jamieson Ave  
18 Alexandria, VA 22314  
Email: dennis.fitzpatrick@usdoj.gov

19 By Fax:

20 Pretrial Services, San Francisco Office  
Betty Kim  
21 450 Golden Gate Avenue, Rm. 5497  
22 San Francisco, CA 94102  
Fax: (415) 436-751723 I declare under penalty of perjury under the laws of the state of California that the  
24 foregoing is true and correct and that this declaration was executed on the above stated date.25  
26  
27 /s/: Abbie Chin  
Abbie Chin